

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Priorities USA, Rise, Inc., and the  
Detroit/Downriver Chapter of the A.  
Philip Randolph Institute,

Plaintiffs,

v.

Dana Nessel, in her official capacity as  
Attorney General of the State of  
Michigan,

Defendant,

and

Michigan Republican Party  
And Republican National Committee,

Intervening Parties,

and

Michigan House of Representatives,  
And Michigan Senate,

Intervening Parties.

NO. 19-13341

JUDGE STEPHANIE  
DAWKINS DAVIS

MAGISTRATE R. STEVEN  
WHALEN

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**MICHIGAN REPUBLICAN PARTY AND REPUBLICAN NATIONAL  
COMMITTEE'S NOTICE OF SUPPLEMENTAL AUTHORITY TO  
RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR A  
PRELIMINARY AND PERMANENT INJUNCTION**

The Michigan Republican Party ("MRP") and Republican National Committee ("RNC") seek to supplement the record in anticipation of the Court deciding Plaintiffs' Motion for a Preliminary and Permanent Injunction (ECF No.

22) and the eventual trial to include citations to and references of convicted voter fraud in The Heritage Foundation's Election Fraud Database. *See* [https://www.heritage.org/voterfraud/search?combine=&state=All&year=&case\\_type=24487&fraud\\_type=24489&\\_ga=2.200484974.1501052555.1594637426-998248419.1594637426](https://www.heritage.org/voterfraud/search?combine=&state=All&year=&case_type=24487&fraud_type=24489&_ga=2.200484974.1501052555.1594637426-998248419.1594637426); *see generally* <https://www.heritage.org/voterfraud> (last accessed July 14, 2020). The Heritage Foundation's Election Fraud Database presents a sampling of proven instances of election fraud from across the country. This database is not an exhaustive or comprehensive list.

Respectfully submitted,

**BUTZEL LONG, PC**

By: /s/ Kurtis T. Wilder  
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DATED: July 14, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2020, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.

By: /s/ Kurtis T. Wilder  
Kurtis T. Wilder (P37017)